

George E. Meyer  
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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November 2, 1995

File Code: 4530  
FID #: 113014220

Mr. Lyle Crouse  
Madison-Kipp Corp.  
201 Waubesa St.  
Madison, WI 53704

Dear Mr. Crouse:

Enclosed in an Administrative Order issued by the Department of Natural Resources relating to the control of air pollution from your operations. The order is issued pursuant to s. NR 424.03(3)(b)2., Wis. Adm. Code, and establishes emission limits which represent the latest available control techniques and operating practices for the operation of three aluminum die casters at your facility located at 201 Waubesa St., Madison. The operation of the three aluminum die casters as described in your application for an air pollution control permit dated April 4, 1995 and subsequent submittals dated June 29, July 17, July 20, August 28, October 6, and October 19, 1995 has been determined to be exempt from the requirement to obtain an air pollution control construction permit. Although exempt from the requirement to obtain a construction permit, the source is subject to all applicable local, state and federal requirements. This order is necessary to document the emission control method approved for this process.

Per s. NR 407.04(1)(b)3., Wis. Adm. Code, new sources that are exempt from the requirement to obtain a construction permit are required to submit an operation permit application for the proposed sources prior to the start of construction. The construction permit application submitted for the die casters meets this requirement.

Your construction permit application fee of \$1,000 will be returned in 4 to 6 weeks. If you have any questions about this order, please contact me at (608) 267-2016.

Sincerely,

Mark Harder, Review Engineer  
Permit Section  
Bureau of Air Management

cc: Southern District Air Program  
Colin Duffy - AM/7

Attach.



## BEFORE THE DEPARTMENT OF NATURAL RESOURCES

In the Matter of Establishing  
 Latest Available Control Techniques  
 and Operating Practices for  
 Madison-Kipp Corp.,  
 201 Waubesa St., Madison,  
 Wisconsin 53704

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Order # AM-95-06

## FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

Findings of Fact

The Department of Natural Resources (DNR) finds that:

1. Madison-Kipp Corp. is located at 201 Waubesa St., Madison, Wisconsin.
2. Madison-Kipp Corp. proposes to operate three aluminum die casters as described in submittals dated April 4, June 29, July 17, July 20, August 28, October 6, and October 19, 1995.
3. DNR has reviewed the information submitted by Madison-Kipp Corp. and other information available to DNR. Based on the review, the DNR has determined that the emission rate of volatile organic compounds will not exceed 5.7 pounds per hour and the maximum theoretical emissions of any hazardous air pollutant will not exceed the applicable de minimis emission rate listed in ch. NR 445, Wis. Adm. Code.
4. The operation of three aluminum die casters is subject to the emission limitations of s. NR 424.03(2)(b), Wis. Adm. Code. Section NR 424.03(2)(b), Wis. Adm. Code requires the source to control organic compound emissions by 85 percent or demonstrate that 85 percent control is infeasible and control organic compounds emission by use of the latest available control techniques and operating practices demonstrating best current technology.
5. Madison-Kipp Corp. has demonstrated that 85 percent control of organic compounds is infeasible for this process due to the excessive cost of add-on controls.
6. DNR has determined that the latest available control techniques and operating practices for this process line is the use of low VOC die lube.

Conclusions of Law

DNR concludes that:

1. DNR has authority under s. 144.31(1)(a), Stats., to promulgate rules contained in chs. NR 400 to 499, Wis. Adm. Code, including but not limited to rules containing emission limitations, compliance schedules and compliance determination methods.
2. The operation of the three aluminum die casters by Madison-Kipp Corp. is subject to the emission limitations of s. NR 424.03(2)(b)2., Wis. Adm. Code.

3. DNR has the authority to approve the use of the latest available control techniques and operating practices under s. NR 424.03(2)(b)2., Wis. Adm. Code.
4. DNR has the authority under s. 144.31(2)(b), Stats., to issue this administrative order.
5. The issuance of this order is reasonable and necessary to accomplish the purposes of ss. 144.30 to 144.426, Stats. and s. NR 424.03(2)(b)2., Wis. Adm. Code.

#### Order

It is therefore ordered that:

1. LACT for the operation of each of the three aluminum die casters is defined as the use of "low VOC" die lube. "Low VOC" for this process is defined as:
  - a. The water content of the die lube, as received, may not be less than 75 percent by weight, and
  - b. The die lube, as applied, shall be diluted at a ratio of at least 55 parts water to one part die lube.
  - c. As an alternative to a. and b., the lubricant blend portion of the die lube shall be diluted at a ratio of at least 223 parts water by volume to 1 part lubricant blend (by volume). (s. NR 424.03(2)(b)2., Wis. Adm. Code)
2.
  - a. Madison-Kipp Corp. shall keep and maintain on site a current material safety data sheet (MSDS) or equivalent for the die lube.
  - b. Madison-Kipp Corp. shall keep and maintain on site a calibration and maintenance log for the mixing equipment.
  - c. If the alternative LACT of 1. c. is used, Madison-Kipp Corp. shall record the amount of die lube material used and the total amount of water added to the mix. The dilution ratio of the parts of water (by volume) to the parts of lubricant blend (by volume) shall be calculated and recorded. (s. NR 439.04(1)(d), Wis. Adm. Code)

#### Notice of Appeal Rights

If you believe that you have a right to challenge this decision, you should know that Wisconsin statutes establish time periods within which requests to review Department decisions must be filed.

To request a contested case hearing pursuant to s. 144.403, Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for a contested case hearing on the Secretary of the Department of Natural Resources. Any such petition for hearing shall set forth specifically the issue sought to be reviewed, the interest of the petitioner, the reasons why a hearing is warranted and the relief desired.

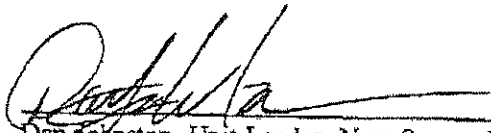
For judicial review of a decision pursuant to ss. 227.52 and 227.53, Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate

circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

This notice is provided pursuant to s. 227.48(2), Stats.

Dated at Madison, Wisconsin, this 2nd day of November 1995

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES  
For the Secretary

  
Dan Johnston, Unit Leader, New Source Permits  
Bureau of Air Management